

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
COTTER TOWER - OKLAHOMA, L.P.,	§	CASE NO. 17-52844-CAG
	§	
DEBTOR	§	CHAPTER 11

COTTER TOWER – OKLAHOMA, L.P.’s APPLICATION FOR FINAL DECREE

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

TO THE HONORABLE CRAIG A. GARGOTTA, UNITED STATES BANKRUPTCY JUDGE:

Comes now, Cotter Tower – Oklahoma, L.P., the Debtor-in-possession (hereinafter “Debtor”), which files this Application for Final Decree, and would respectfully show unto the Court the following:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. § 1101, et seq., U.S.C. §§ 158 and 1334, and Federal Rule of Bankruptcy Procedure 3022.
2. On December 12, 2017 (the “Petition Date”), the Debtor filed a Voluntary Petition for Relief under Chapter 11 of Title 11, United States Code (the “Bankruptcy Code”).
3. A copy of the proposed Final Decree in conformity with Local Rule 9013 is submitted herewith.
4. The Debtor is a Texas Limited Partnership with its principal place of business located in San Antonio, Texas. The Debtor previously owned and operated a thirty-six story commercial office building located at 100 N. Broadway Ave., Oklahoma City, Oklahoma, which was commonly known as “Cotter Ranch Tower” and hereinafter referred to as the “Property.”

5. On August 17, 2018, an Order Approving Motion to Sell Property of the Estate Free and Clear of Liens, Claims, Encumbrances and Interests (the “Sale Order”) (Doc. 93) was entered herein. The Sale Order authorized the title company closing the sale of the Property to pay all secured claims held against the Property out of the proceeds from the sale.

6. On August 17, 2018, the Court entered an Order Authorizing Assumption and Assignment of Tenant Leases and Certain Executory Contracts Pursuant to 11 U.S.C. §365 (the “Assumption and Assignment Order”) (Doc. 94).

7. The Property was sold pursuant to an Order entered herein authorizing the same with a closing which occurred on August 31, 2018. All secured claims were paid in full at closing by the title company. The Assumption and Assignment Order fixed the amounts due to each counterparty to the assumed leases and assumed contracts in connection with the Property, and such amounts were paid over to the buyer of the Property to hold and use for the benefit of such counterparties. Thus, any counterparty to an assumed lease or assumed contract had its claim funded and paid in full out of the Debtor’s share of the proceeds from the sale of the Property at closing.

8. Finally, on February 12, 2019, an Order Confirming First Amended Chapter 11 Plan of Liquidation (the “Plan”) was entered herein (Doc. 149). The Plan (Doc. 139) provided that the Disbursing Agent would pay all remaining unpaid Allowed Claims.

9. Based upon a review of the Debtor’s claim register, the Disbursing Agent paid all remaining Allowed Claims which were not disputed in full.

10. The Debtor filed certain Objections to Claims filed in this case. All of said Objections have been resolved and the Disbursing Agent has timely paid all Allowed Claims.

11. Debtor has substantially consummated the Plan. Pursuant to 11 U.S.C. §1101(2), substantial consummation is defined as:

- (A). transfer of all or substantially all of the property proposed by the plan to be transferred;
- (B). assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and
- (C). commencement of distribution under the plan.

12. Debtor has completed all of the foregoing and, in fact, has completed all distributions to creditors required by the Plan.

13. Debtor has also paid all allowed administrative claims.

14. Fed. R. Bankr. P. 3022 provides that after an estate is fully administered in a Chapter 11 case, a court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case. The term “fully administered” generally means the debtor’s chapter 11 plan has been confirmed, all bankruptcy claims have been resolved, and the plan is “substantially consummated”. The Debtor’s Plan has been confirmed, there are no claims left to resolve in this case, and Plan has been substantially consummated. Therefore, based upon the foregoing and pursuant to 11 U.S.C. §350, it is necessary and appropriate that the Court enter a final decree closing this case effective upon the date of the entry of the same.

WHEREFORE, PREMISES CONSIDERED, Cotter Tower – Oklahoma, L.P. respectfully requests that the Court enter a final decree and that the Court grant to it such other and further relief to which it may be justly entitled.

Stephen J. Moriarty
Fellers Snider Blankenship Bailey & Tippens, PC
100 North Broadway Ave., Suite 1700
Oklahoma City, OK 73102
Via the Court's ECF Filing System

Larry G. Ball
Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C.
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Oklahoma City, OK 73102-8805
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UNITED STATES TRUSTEE:
Post Office Box 1539
San Antonio, Texas 78295-1539
Via the Court's ECF Filing System

/s/ H. Anthony Hervol _____
H. Anthony Hervol

Label Matrix for local noticing
0542-5
Case 17-52844-cag
Western District of Texas
San Antonio
Sun Nov 10 23:32:45 CST 2019

Cotter Tower - Oklahoma L.P.
c/o Marcus P. Rogers, PC
2135 E Hildebrand
San Antonio, TX 78209-6332

U.S. BANKRUPTCY COURT
615 E. HOUSTON STREET, ROOM 597
SAN ANTONIO, TX 78205-2055

A-Russell's Mr. Rooter, Inc.
8132 W. Reno
Oklahoma City, OK 73127-7229

Accenture, LLP
161 North Clark Street
Chicago, IL 60601-3362

American Staffcorp of OKC, LLC
6301 S. Mingo Rd
Tulsa, OK 74133-6319

American Staffcorp of OKC, LLC
c/o Larry G. Ball
100 North Broadway Avenue, Suite 2900
Oklahoma City, OK 73102-8865

Andrews Davis, PC
Cathy Collins/Administrator
100 N. Broadway, Suite 3300
Oklahoma City, OK 73102-8831

Arapahoe Resources
Cotter Ranch Tower
100 N. Broadway Ave., Suite 3150
Oklahoma City, OK 73102-8821

BL3 Inc. Plumbing and Drain Cleaning
P.O. Box 6499
Oklahoma City, OK 73153-0499

BancFirst
Randy Foraker, EVP, Chief Risk Officer
P. O. Box 26788
Oklahoma City, OK 73126-0788

Bank SNB
c/o David S. Gragg
Langley & Banack, Inc.
745 E. Mulberry, #700
San Antonio, Texas 78212-3172

Bank SNB, N.A.
6301 Waterford Blvd., Suite 101
Oklahoma City, OK 73118-1161

Bettye Ruth Cotter
3601 N.W. 62nd Street
Oklahoma City, OK 73112-1401

Brake Away Logistics
Cotter Ranch Tower
100 N. Broadway Ave., Suite 3108
Oklahoma City, OK 73102-8608

Brierly Plumbing Technologies
Roto Rooter Plumbing
3120 S Ann Arbor Ave
Oklahoma City, OK 73179-7634

CBRE Inc
PO Box 848844
Los Angeles, CA 90084-8844

CBRE, Inc.
3401 NW 63rd St, Suite 400
Oklahoma City, OK 73116-3794

CHRISTOPHER LEE MEILE - URBAN
LOCKWERX LLC
3101 ABBEY RD
Oklahoma City, OK 73120-2012

CITY OF OKLAHOMA CITY
PO BOX 26570
Oklahoma City, OK 73126-0570

COE PLUMBING INC
PO BOX 15482
Oklahoma City, OK 73155-5482

COPS PRODUCTS
416 HUDIBURG CIRCLE STE B
Oklahoma City, OK 73108-1048

CUDD Pumping Services, Inc.
Cotter Ranch Tower
100 N. Broadway Ave., Suite 2500
Oklahoma City, OK 73102-8809

Calverts Plan Interiors, Inc.
8308 Classen Blvd.
Oklahoma City, OK 73114

Calverts Plant Interiors, Inc.
5308 Classen Blvd.
Oklahoma City, OK 73118-4291

Chamsolme Harroz Achnebel, PLLC
Layni Carney/Office Manager
100 N Broadway Avenue, Suite 1800
Oklahoma City, OK 73102-8614

Chubbick Duncan & Robey, P.C.
Cotter Ranch Tower
100 N. Broadway Ave., Suite 2300
Oklahoma City, OK 73102-8802

City of Oklahoma City
420 W Main St Suite 120
Box 3
Oklahoma City, OK 73102-4435

Coe Plumbing, Inc.
3928 E. Reno Ave.
Oklahoma City, OK 73117-7220

Commercial Oklahoma, Inc.
Cotter Ranch Tower
100 N. Broadway Ave., Suite 3130
Oklahoma City, OK 73102-8837

17-52844-cag Doc#169 Filed 11/11/19 Entered 11/11/19 13:21:41 Main Document Pg 7 of		
Comptroller of Public Accounts	Continental Resources, Inc.	Continental Resources, Inc.
C/O Office of the Attorney General	Heather Scott, Director	c/o Taylor L. Pope
Bankruptcy - Collections Division MC-008	P.O.Box 269000	PO Box 268836
PO Box 12548	Oklahoma City, OK 73126-9000	Oklahoma City, OK 73126-8836
Austin TX 78711-2548		
Convergint Technologies, LLC	Coventry Investments	DKT Energy & Neomorph
c/o James Vogt	Cotter Ranch Tower	Joe T. Vaughn/Manager
Reynolds, Redings, Vogt & McCart, PLLC	100 N. Broadway Ave., Suite 2430	100 N. Broadway, STE 2270
101 Park Avenue, Suite 1010	Oklahoma City, OK 73102-8803	Oklahoma City, OK 73102-8838
Oklahoma City, OK 73102-7251		
Daugherty, Fowler, Peregrin, Haught & Je	Dawson Geophysical	Deloitte LLP
Danny Meier/Administrator	Risk Management	Mitchell Scalf
100 N. Broadway Avenue, Suite 2000	Attn: Jessica Forsdick	2200 Ross Avenue, Ste 1600
Oklahoma City, OK 73102-8846	10333 Richmond Ave. Suite 800	Dallas, TX 75201-6703
	Houston, Texas 77042-4128	
Deloitte, LLP	Derrick & Briggs, LLP	Destin Construction Inc
Cotter Ranch Tower	Helen Sullivan-Reyna	PO Box 271198
100 N. Broadway Ave., Suite 3250	100 N. Broadway Avenue, Suite 2830	Oklahoma City, OK 73137-1198
Oklahoma City, OK 73102-8811	Oklahoma City, OK 73102-8831	
Design Partnerships Inc	(c)DUTCHER & COMPANY, INC.	EALIS ELECTRONICS CORP
3037 NW 63rd St 202W	TRAVIS L. WILLIAMS	PO BOX 721140
Oklahoma City, OK 73116-3616	100 N BROADWAY AVE STE 2110	Oklahoma City, OK 73172-1140
	OKLAHOMA CITY OK 73102-8614	
EMCS ENTERPRISES INC	EUREKA WATER COMPANY - OZARKA WATER	Estate of James F. Cotter, Dec'd
36 NE 46TH ST	AND COFFEE SERVICE	c/o Marcus P. Rogers, P.C.
Oklahoma City, OK 73105-2011	PO BOX 26730	2135 E. Hildebrand
	Oklahoma City, OK 73126-0730	San Antonio, TX 78209-6332
Estate of James F. Cotter. Dec'd	Fellers Snider Blankenship Bailey & Tippens,	Fellers, Snider, Blankenship, & Tippens
c/o Marcus P. Rogers	c/o Stephen J. Moriarty	Attn: DeAnna Carter
2135 Hildebrand	100 N. Broadway, Suite 1700	100 N. Broadway Avenue, Suite 1700
San Antonio, TX 78209-6332	Oklahoma City, OK 73102-8820	Oklahoama City, OK 73102-8820
Fibernet Direct Texas, LLC	Forrest Butch Freeman	Globe Life and Accident
Cristina Valdes	Oklahoma County Treasurer	Sherry Garrison
9250 West Flager Street	320 Robert S. Kerr, Rm 307	100 N. Broadway Avenue, Suite 700
Miami, FL 33174-3415	Oklahoma City, OK 73102-3441	Oklahoma City, OK 73102-8812
Globe Life and Accident Insurance Company	Goldfire Studios	Gretchen Crawford
c/o Steven J. Adams, Esq.	James Simpson/President	Assistant District Attorney
100 W. 5th St., Ste. 1100	100 N. Broadway Avenue, STE 2250	Oklahoma County Treasurer
Tulsa, OK 74103-4217	Oklahoma City, OK 73102-8804	320 Robert S. Kerr, Suite 505
		Oklahoma City, OK 73102-3412
HARRISON ORR AIR CONDITIONING LLC	HD SUPPLY FACILITIES MAINTENANCE	HNTB Corporation
4100 N WALNUT	PO BOX 509058	Attn: Peggy Gaylord, Procurement Manager
Oklahoma City, OK 73105-3798	San Diego, CA 92150-9058	715 Kirk Drive
		Kansas City, MO 64105-1310

Hall Estill Trent Corken-Office Administrator 100 N. Broadway Avenue, Suite 2900 Oklahoma City, OK 73102-8865	Hall, Estill, Hardwick, Gable, Golden & Nels c/o Larry Ball 100 N. Broadway, Suite 2900 Oklahoma City, OK 73102-8808	Hymers Photography Cotter Ranch Tower 100 N. Broadway Ave., Suite CO-03 Oklahoma City, OK 73102-8614
InServices, Inc. Dillingham Insurance dba In Service PO Box 1669 Oklahoma City, OK 73101	Internal Revenue Service - Insolvency P.O. Box 7346 Philadelphia, PA 19101-7346	JANES ELECTRIC SERVICE INC 33 NW 60TH STREET Oklahoma City, OK 73118-7405
JP Morgan Chase Cotter Ranch Tower 100 N. Broadway Ave., Suite 400 Oklahoma City, OK 73102-8841	James Adam Cotter 23019 Steeple Bluff San Antonio, TX 78256-1603	James Andrew Cotter 6 Lincoln Place Rancho Mirage, CA 92270-1928
James Vale Lee Cotter 28 Morning Green San Antonio, TX 78257-2602	Jolen Operating Company Janae Gorman 100 N. Broadway Avenue, Suite 2460 Oklahoma City, OK 73102-8868	Jordan C. Braun Cotter Ranch Tower 100 N. Broadway Ave., Suite 3020 Oklahoma City, OK 73102-8606
Kurts Pest Control Inc PO BOX 23315 Oklahoma City, OK 73123-2315	Land Information Services Wade Brawley/President 100 N. Broadway Avenue, Suite 2010 Oklahoma City., OK 73102-8846	Law Ofc. of Robert H. Alexander Cotter Ranch Tower 100 N. Broadway Ave., Suite 1820 Oklahoma City, OK 73102-8832
Luckinbill Inc. PO Box 186 Enid, OK 73702-0186	Marcus P. Rogers, Independent Administrator the Estate of James F. Cotter, deceased c/o Marcus P. Rogers 2135 E. Hilderbrand San Antonio, Texas 78209-6332	McCoy & Orta. P.C. Tammy Lind/Office Manager 100 N. Broadway Avenue, Suite 2600 Oklahoma City, OK 73102-8868
Mesa Natural Gas Solutions Cotter Ranch Tower 100 N. Broadway Ave., Suite 3120 Oklahoma City, OK 73102-8868	Metro Glass Inc 8025 N Rockwell Oklahoma City, OK 73132-4213	Metro Technology Center, Inc. Karla Graham 100 N. Broadway Avenue, Suite 300 Oklahoma City, OK 73102-8847
Monnet, Hayes, Bullis PLLC Cotter Ranch Tower 100 N. Broadway Ave., Suite 2730 Oklahoma City, OK 73102-8804	(p)NAFA CAPITAL MARKETS 3700 WEST ROBINSON STREET SUITE 204 NORMAN OK 73072-3655	NATURAL WOOD FLOORS INC - QUALITY FLOOR 719 N VIRGINIA AVE Oklahoma City, OK 73106-2631
OG&E PO BOX 24990 Oklahoma City, OK 73124-0990	OGP Energy Limited Partnership #1 Cotter Ranch Tower 100 N. Broadway Ave., Suite 1830 Oklahoma City, OK 73102-8805	OKLAHOMA COUNTY TREASURER PO BOX 268875 Oklahoma City, OK 73126-8875
ON CALL JUNK HAUL LLC 8216 NW 159TH ST Edmond, OK 73013-5804	ONESOURCE MANAGED SERVICES LLC PO BOX 270538 33 N MERIDIAN Oklahoma City, OK 73107-6501	Oklahoma County Treasurer Tammy Jones, Pro Se 320 Robert S. Kerr, Room 307 Oklahoma City, OK 73102-3441

Oklahoma County Treasurer's Office
320 Robert S. Kerr, Room 307
Oklahoma City, Oklahoma 73102-3441

Oklahoma Tax Commission
General Counsel's Office
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Oklahoma City, OK 73102-8601

Otis Elevator Company
PO Box 730400
Dallas, TX 75373-0400

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Oklahoma City, OK 73134-5031

Petroleum Club of Oklahoma City
Cotter Ranch Tower
100 N. Broadway Ave., Suite 3400
Oklahoma City, OK 73102-8824

Pinnacle Towers
Cotter Ranch Tower
100 N. Broadway Ave., Suite 3050
Oklahoma City, OK 73102-8826

Potts Exploration, LLC
909 E. Britton Road
Oklahoma City, OK 73114-7802

Precision Mechanical, LLC
860656 S. 3320 Rd
Wellston, OK 74881-8067

R. Brown Wallace
Cotter Ranch Tower
100 N. Broadway Ave., Suite 2530
Oklahoma City, OK 73102-8805

R. Brown Wallace, P.C.
544 Shawnee St.
NORMAN, OK 73071-4631

Richard G. Jenkins
P.O. Box 591565
San Antonio, TX 78259-0127

Rogers Safe and Lock, LLC
906 Northwest 5th Street
Oklahoma City, OK 73106-7427

Roto Rooter
Plumbing & Drain Cleaning
3120 S. Ann Arbor Ave
Oklahoma City, OK 73179-7634

Russell D Thorp - Schuler Enterprise
PO Box 30847
Edmond, OK 73003-0015

Ruston Aviation
P.O. Box 607
Ruston, LA 71273-0607

Samis Family Investments, LLC
Eileen Motley/Office Manager
100 N. Broadway, Suite 1850
Oklahoma city, OK 73102-8607

Southwestern Restoration
and Waterproofing
PO Box 54858
Oklahoma City, OK 73154-1858

Staples Contract & Commerical, Inc.
PO Box 415256 Dept SNA
Boston, MA 02241-5256

Talada, LLC
Cotter Ranch Tower
100 N. Broadway Ave., Suite 3025
Oklahoma City, OK 73102-8825

Tenaris Global Services
Cotter Ranch Tower
100 N. Broadway Ave., Suite 2525
Oklahoma City, OK 73102-8868

Tidelands Geophysical
Cotter Ranch Tower
100 N. Broadway Ave., Suite 2420
Oklahoma City, OK 73102-8803

Unifirst Corporation
Attn: Accounts Receivable
68 Jonspin Road
Wilmington, MA 01887-1086

United Protective Services of
Oklahoma City, LP
6500 Greenville Ave, Suite 525
Dallas, TX 75206-1000

United States Attorney General
Department of Justice
950 Pennsylvania Ave., N.W.
Washington, DC 20530-0009

United States Attorney/IRS
601 N.W. Loop 410, Suite 600
San Antonio, TX 78216-5597

United States Trustee
P.O. Box 1539
San Antonio, TX 78295-1539

United States Trustee - SA12
US Trustee's Office
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PO Box 1539
San Antonio, TX 78295-1539

Urban Space Construction
28 Morning Green
San Antonio, TX 78257-2602

Valeri Marie Cotter Zaharie
5743 E. Shoreline
Post Falls, ID 83854-6855

Vendor Recovery Fund IV, LLC
PO Box 669
Smithtown, NY 11787-0710

Veolia Energy Oklahoma City Inc
Box 681038
Chicago, IL 60695-2039

Veolia Energy Oklahoma City Inc.
14055 Riveredge Drive, Ste 240
Tampa, FL 33637-2099

Veolia North America
100 N. Broadway, Suite 1520
Oklahoma City, OK 73102-8601

Vets Septic Service Inc.
1024 SW 21st Street
Oklahoma City, OK 73108-7439

Vivian Claudette Mueller
102 Kathy Drive
Kerrville, TX 78028-9744

Voss Electric Co
1601 Cushman Dr.
Lincoln, NE 68512-1237

Voss Electric Co.
P.O. Box 22159
Attn: Accounts Rec.
Lincoln, NE 68542-2159

Yardi Marketplace
P.O. Box 82569
Goleta, CA 93118-2569

iPlumb Co.
2736 SW 48th St
Oklahoma City, OK 73119-5213

H. Anthony Hervol
Law Office of H. Anthony Hervol
4414 Centerview Dr, Suite 207
San Antonio, TX 78228-1432

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

NAFA Capital Markets
Cotter Ranch Tower
100 N. Broadway Ave., Suite 2550
Oklahoma City, OK 73012

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Dutcher & Company, Inc.
Travis L. Williams
100 N. Broadway Avenue, Suite 2100
Oklahoma City, OK 73102

End of Label Matrix	
Mailable recipients	129
Bypassed recipients	0
Total	129